



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
HATTIESBURG DIVISION**

**MERVIN ANDREWS, JR., ET AL.**

**PLAINTIFFS**

**v.**

**CIVIL ACTION NO.: 2:03CV293**

**CLARK SAND COMPANY, ET AL.**

**DEFENDANTS**

**DESIGNATION OF EXPERT  
WITNESSES BY PEARL/JAMES JOINT VENTURE**

Defendant, Pearl/James Joint Venture, through undersigned counsel, submits the following list of expert witnesses whom it may call at trial of the captioned case:

1. **Mike Cashio, Industrial Hygienist**  
S & ME, Inc.  
9751 Southern Pine Boulevard  
Charlotte, NC 28273
2. **Dr. William D. Frazier**  
**Jackson Lung Clinic**  
1151 North State Street, Suite 304  
Jackson, Mississippi 39202
3. **Gerald Martin Goldhaber, Ph. D.**  
Goldhaber Research Associates, LLC  
The Aston  
800 6<sup>th</sup> Avenue, Suite 26G  
New York, NY 10001

4. Defendant further designates all experts designated by any other party, including those of all co-defendants, even if said co-defendant is dismissed prior to trial.

5. Defendant reserves the right to call any past or present treating or examining physicians and/or other health care providers of the plaintiffs, as well as past or present co-workers, supervisors, or any other job or exposure-site witnesses.

6. Defendant reserves the right to supplement this designation as discovery is ongoing in this case and, further, necessary medical, product information and exposure information have not been provided by the plaintiffs.

7. Defendant reserves the right to withdraw the designation of any expert and to re-designate said expert as a consulting expert.

This listing is preliminary. Discovery is ongoing. Defendant reserves the right to supplement and/or amend this listing.

Respectfully submitted, this, the ~~1st~~ day of February, 2005.

PEARL/JAMES JOINT VENTURE

  
JEREMY D. HAWK

OF COUNSEL:

*Wade G. Manor (MSB# 10167)*  
*Jeremy D. Hawk (MSB# 101189)*  
*J. Scott Rogers, Esquire (MSB# 100014)*  
Scott, Sullivan, Streetman & Fox, P.C.  
P. O. Box 13847  
Jackson, Mississippi 39236-3847  
Telephone: (601) 607-4800

**CERTIFICATE OF SERVICE**

I, one of the counsel of record for **DEFENDANT, PEARL/JAMES JOINT VENTURE**, do hereby certify that I have this date caused to be delivered, via **United States Mail, postage prepaid**, a true and correct copy of the above and foregoing document to:

**Alwyn H. Luckey, Esquire**  
**Steven Mullins, Esquire**  
2016 Bienville Blvd.  
Ocean Springs, MS 39564

**W. Harvey Barton, Esquire**  
**Skip Edward Lynch, Esquire**  
Barton and Williams, P. A.  
3007 Magnolia Street  
Pascagoula, MS 39567

**All other known counsel of record**

THIS the **6<sup>th</sup>** day of February, 2005.

  
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JEREMY D. HAWK